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THEOCKY FLATS PLANT EMD ADMINISTRATION PROCEDURES MANUAL

CATEGORY 1

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1.0 PURPOSE

This procedure describes the activities, responsibilities and documentation required to identify, control, provide dispositions, and verify completed corrective actions for nonconforming items associated with Environmental Management (EM) programs and work activities. This procedure implements the quality assurance (QA) requirements of Section 15.0, Control of Nonconforming Items/Activities, of the EM Quality Assurance Program Description (QAPD).

This procedure supports implementation of Rocky Flats Plant 1-50000-ADM-15.01, Control of Nonconforming Items.

2.0 SCOPE

This procedure applies to all nonconforming items associated with activities performed by EM and contractor/supplier personnel in support of EM activities.

This procedures applies to those measures necessary to prevent the inadvertent installation or use of nonconforming items. This procedure also applies to EM work activities that do not conform to the specifications and/or requirements of EM controlled documents that prescribe how quality affecting work is to be conducted. Controlled documents that prescribe work include work plans, procedures, instructions, and drawings. The Nonconformance Report (NCR) will be used to control and evaluate specific nonconforming items and activities.

The EM Nonconformance Reporting Program described in this procedure is not intended to be used as a substitute for occurrence reporting, as required by DOE Order 5000.3A, Occurrence Reporting or any other established reporting requirements.

This procedure applies to all EG&G Rocky Flats personnel and subcontractors (when required by contract or purchase order) that are part of, or indirectly support, EM programs and projects at the Rocky Flats Plant (RFP).

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3.0 TERMS/DEFINITIONS

NOTE

Definitions for the following terms are in addition to those provided in Appendix A of the EM QAPD and in 1-5000-ADM-15.01.

- 3.1 Activity An aspect of work, service, operation, condition, or process which impacts quality, safety, or the environment.
- 3.2 Acceptable-with-Qualifications Environmental measurement and observation data that meets most, but not all, data validation criteria. All primary validation criteria must be achieved within acceptable limits including instrument calibration, detection limits, analytical method requirements, and correct identification of compounds and analytes.
- 3.3 Disposition The description of the action to be taken to resolve a nonconforming condition or item and to restore acceptable conditions.
- 3.4 Environmental Management (EM) Organizations Rocky Flats Plant (RFP) organizations that protect human health and the environment and remediate past impacts. These organizations are the Environmental Protection Department and Environmental Restoration.
- 3.5 Flags Indicators of anomalous or invalid data.
 Flags typically consist of alphanumeric symbols
 attached to data to indicate that there is some type of
 anomaly in the data or that the data is invalid. For
 example, "R" is used to flag reject data.
- 3.6 Item An all-inclusive term used in place of any of the following: assembly, component, data, equipment, material module, part, sample, structure, subassembly, subsystem, or unit.
- 3.7 Nonconformance Report (NCR) A report used to document the identification, disposition, and correction of nonconformances.
- 3.8 Nonconformance A deficiency in the characteristics, documentation or procedure that renders the quality of an item or activity unacceptable or indeterminate. For

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EM purposes, reference to nonconforming "conditions" or "items" within this procedure includes activity, item, service, data, material, equipment, structure, or condition.

- Reject/Scrap A disposition that is assigned an item when measurement data fails to meet objective standards or primary validation criteria, or when an item is determined unsuitable for its intended purpose, is incapable of being reworked or repaired, and will be removed or discontinued from use.
- 3.10 Repair A disposition that authorizes a process of restoring a nonconforming characteristic to a condition such that the capability of an item or condition to function reliably and safely is unimpaired, even though that item, aspect of work, activity, data, condition, equipment, or service still does not conform to the original requirement.
- 3.11 Responsible Organization The organization that is responsible for the disposition of the nonconformance.
- 3.12 Revision A change to the disposition that is intended to replace the original disposition or any portion thereof.
- 3.13 Rework A disposition that authorizes a process by which a nonconforming condition or item is made to conform to the original requirements by completion or correction, using existing approved procedures.
- 3.14 Supplemental Response An update to the disposition that provides additional information.
- 3.15 Use-As-Is A disposition that is permitted for a nonconforming condition or item when it can be established that the item, aspect of work, activity, data, condition, equipment, or service is satisfactory for its intended use. As used in this procedure, Use-As-Is also includes data that are Acceptable -With-Qualifications.

4.0 RESPONSIBILITIES

The EM Director(s), or delegate(s), is responsible for coordinating with the EM Quality Assurance Program

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Manager (QAPM) to assure Nonconformance Reports (NCRs) are properly reviewed and resolved.

4.2 The EM QAPM is responsible for:

- Coordinating and processing NCRs, coordinating the use of status tags and flags, coordinating preparation and maintenance of NCR files, and verifying disposition implementation.
- Designating an EM Quality Specialist to validate NCRs.
- 3. Designating the EM NCR Coordinator.
- 4. Assigning disposition responsibilities to the appropriate Responsible EM Organization.
- 5. Determining root cause of deficiencies that result in NCRs.

4.3 EM and Subcontractor Personnel are responsible for:

- 1. Initiating NCRs in accordance with this procedure. The initiator shall notify their immediate supervisor or the Responsible Organization Manager of any nonconformance if personnel believe the situation warrants immediate management attention.
- 2. Submitting NCRs to the QAPM for processing.

4.4 The EM NCR Coordinator is responsible for:

- Processing and tracking NCRs through the various phases of validation, disposition, concurrence, implementation, verification, and closure. The NCR Coordinator transmits NCRs to the various individuals and organizations responsible for each of these phases.
- 2. Contacting Site Quality Assurance (SQA) NCR Coordinator for a unique NCR Number and transmitting NCR to SQA NCR Coordinator upon request, or at a minimum for final closure.
- Transmitting copies of EM NCRs to the SQA NCR Coordinator for entry into the main NCR database.

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4. Ensuring that permanent NCR records are reviewed for classification and transmitted to the EMD Records Center as QA records per 3-21000-ADM-17.01, Records Management.

- 4.5 The EM Quality Specialist, as designated by the QAPM, is responsible for:
 - 1. Reviewing NCRs and associated items/activities to determine if the NCR is valid.
 - 2. Discussing any potentially invalid NCR with the initiator as part of the validation process.
 - 3. Routing valid and non-valid NCRs through the EM NCR Coordinator for processing.
 - 4. Providing EM QA concurrence on NCR dispositions provided by Responsible EM Organizations.
 - 5. Providing final EM QA review of action(s) implemented to correct deficiency.
 - 6. Interacting with SQA to resolve any SQA concerns and to assist in NCR final closure.
- 4.6 Responsible Organization Managers are responsible for:

NOTE

The following responsibilities may be performed at the Project level. Therefore, the following responsibilities are applicable to Project Managers (e.g., Operable Unit Project Managers) as well as Organization Managers.

If an Occurrence Report (1-5000-xxxxxxx, Occurrence Reporting) is written as a result of a deficiency noted in an NCR, the NCR No. should be referenced on the Occurrence Report and the Occurrence Report No. added to the NCR.

1. Evaluating nonconforming conditions in accordance with Rocky Flats Procedure ADM-16.01, Occurrence Reporting Process, to determine if identified conditions are reportable to the DOE or other identified organizations (e.g., Environmental

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Protection Agency and Colorado Department of Health).

- Providing proposed dispositions, or assigning a 2. technical specialist to provide dispositions, for NCRs for which the QAPM has deemed them responsible and submitting proposed dispositions to the QAPM and other affected divisions/ organizations for concurrence.
- Determining if nonconforming items or data that 3. are tagged/flagged need to be segregated, and assuring that they are segregated if necessary.
- Assuring the timely implementation of approved 4. dispositions.
- Assisting the QAPM in determining the root cause 5. of deficiencies and implementing steps to prevent recurrence, when practical, when required, or when trends indicate a problem.
- Site Quality Assurance (SQA) The organization 4.7 responsible for 1-50000-ADM-15.01, Control of Nonconforming Items. This organization provides oversight and interface for this procedure.

5.0 PROCEDURE

NOTE

Attachment 1 consists of a flowchart which summarizes the NCR process described below.

- Initiation of a Nonconformance Report
 - Upon detection of a nonconforming condition, 5.1.1 EM or subcontractor/supplier personnel shall initiate an NCR (Attachments 2 and 3).
 - 5.1.2 The initiator shall complete the appropriate sections of the NCR "nonconformance block" (as instructed in Attachment 3) including pertinent information regarding cited requirements and the actual nonconforming condition.

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5.1.3 The initiator shall forward the NCR to the EM OAPM for validation.

NOTE

A data validation subcontractor may be used to validate laboratory analytical data according to the data validation guidelines referenced in paragraph 2.2.11.2 of Section 3.0 of the EM QAPD. Project specific work plans identify data that are required to be validated. Any validation subcontractor submits data validation reports to the Project Manager or designated Task Leader. The Project Manager or Task Leader reviews data validation report to determine the validity of data based on the seven criteria listed in paragraph 2.2.14 of Section 3.0 of the EM QAPD.

5.1.4 NCRs issued for data validation shall be initiated by Project Managers or designated Task Leaders for data that do not meet required data validation guidelines and shall be based on data validation results.

NOTE

For data validation NCRs where the initiator and the technical specialist responsible for the disposition are the same person, the information provided by the initiator and the person responsible for the disposition (see Attachment 3) can be completed and submitted at the same time.

- 5.2 Validation and Recording of a Nonconformance Report
 - 5.2.1 The EM QAPM shall assign an appropriate individual (Quality Specialist) to perform review and validation.
 - 5.2.2 The Quality Specialist determines if the NCR is valid by review of the stated nonconforming condition and through assuring that the Nonconformance Block is properly completed and adequately describes the nonconformance.
 - 5.2.3 If the NCR is determined to be invalid, the Quality Specialist will contact the initiator to discuss the reasons. Following discussion, if the NCR is still determined to

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be invalid, the Quality Specialist shall enter the word "VOID" in the disposition block, followed by a statement of justification for voiding the NCR. The initiator shall sign and date the justification to indicate concurrence. The remaining section or blocks of the NCR shall be marked "N/A". A copy of the invalidated NCR shall be retained in the NCR master file and transmitted to EM record center per 3-21000-ADM-17.01, Quality Assurance Records Management.

- 5.2.4 If the NCR is found to be valid, it shall be forwarded to the EM NCR Coordinator for number assignment, logging, and transmittal to the affected organizations responsible for disposition of the nonconformance and a copy will be forwarded to EM record center.
- 5.2.5 The EM NCR Coordinator shall contact the SQA NCR Coordinator for a NCR number, and provide the SQA NCR Coordinator with a description of the nonconformance.
- 5.2.6 Submit a copy of the validated NCR to the SQA NCR Coordinator within 5 working days.

NOTE

The SQA NCR Coordinator assigns all NCR numbers at the RFP from the site NCR Master Log and enters those numbers into a site-wide NCR data base. A copy of the NCR will be submitted to the SQA NCR Coordinator at their request at any phase during the NCR process.

The NCR Number is based on the following format, as required by 1-50000-ADM-15.01, Control of Nonconforming Items: EMYYXXXX

Where:

EM = Environmental Management

YY = The last two digits of the current

calendar year

XXXX = A sequential number beginning with

0001 for each calendar year.

5.2.7 Valid NCRs shall be entered in the EM Nonconformance Report Log (Attachment 3) as a

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form of internal tracking by the EM NCR Coordinator. All columns of the log shall be filled out for validated NCRs, which have had numbers assigned by SQA.

5.3 Identification and Segregation of Nonconforming Items:

- 5.3.1 Uniquely identify nonconforming items and/or segregated in accordance with the following provisions. The marking or segregation shall not adversely affect the end use of the item.
- 5.3.2 When practical, the EM QAPM, or delegate, with the assistance from the Responsible Organization shall segregate the nonconforming item by placing it in a clearly identified and designated hold area until the disposition of the nonconformance is verified.
- 5.3.3 An NCR Status Tag (Attachment 5) shall be filled out and affixed to the item by a designee of the QAPM. For data validation NCRs, the data validation subcontractor will flag analytical data that is either acceptable with qualifications or reject as directed by the Project Manager or appropriate Task Specialist.

NOTE

The NCR Status Tag/Flag shall remain with the item until the disposition of the NCR has been completed and verified. If tagging of each item is not practical, the NCR Status Tag shall be applied to the container, package, storage or hold area, or in the case of data - to the data set.

The NCR Status Tags are not QA records and shall be destroyed when removed by the EM QAPM or designee (see Step 5.7.3).

- 5.3.4 When only a portion of an item or activity is nonconforming, the NCR Status Tag shall clearly describe the condition.
- 5.3.5 The Responsible Organization Manager shall establish and apply controls (e.g., tags and

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flags) to prevent further processing, installation, use, or work on the activity, unless stopping would be detrimental to safety or health of personnel or the environment, violate regulatory requirements, or damage equipment. When only a specific portion of the item or activity is nonconforming, and has been properly identified, then work may proceed on the remaining areas provided that the continued activities will not cover up or conceal the nonconforming condition or its cause and the future activities will not be affected by the nonconforming condition.

NOTE

Questions regarding the scope of the nonconforming condition and the effect on other areas may be discussed with the EM QAPM.

- 5.3.6 The EM QAPM, or delegate, shall be responsible for removal of the NCR Status Tag after verification and closeout actions, or for notifying responsible personnel to remove the tag or flag after verification and closeout actions are completed (see Paragraph 5.7).
- 5.3.7 If tagging/flagging or segregation is not possible, other precautions shall be taken by the Responsible Organization to preclude inadvertent installation or use.

5.4 <u>Subcontractor Nonconformance Reports</u>

- When a subcontractor is performing work to an approved EG&G work plan, procedure, instruction, or design and a nonconforming condition is identified by the subcontractor and dispositioned as Use-As-Is or Repair through their own NCR program, conversion of the contractor's NCR to an EG&G NCR will be required.
- 5.4.2 A copy of the subcontractor's NCR form shall be attached to the newly initiated EG&G NCR.

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The nonconformance block will be completed by the delegated Quality Specialist and shall be processed according to this procedure, as if it were an EG&G EM NCR.

5.5 Disposition of NCRs

- 5.5.1 The EM QAPM shall coordinate with the EM Managers to assign the NCR to the Responsible Organization to provide a proposed disposition for the NCR within 30 calendar days. This assignment shall be recorded on the NCR transmittal cover sheet. The NCR shall be forwarded to the Responsible Organization for disposition, with copies to affected organizations in accordance with the transmittal cover sheet.
- 5.5.2 For situations that prevent completion of the disposition within the maximum time frame of 30 days, the division performing the disposition shall notify, in writing, the EM NCR Coordinator of the reasons for the delay and the revised commitment date.
- 5.5.3 The SQA NCR Coordinator will be notified of any extensions for dispositions.
- The Responsible Organization Manager, or delegated technical specialist shall assure that the documented condition is adequately identified and described and shall propose a disposition to resolve the nonconformance.

 The following information shall be included in the disposition:
 - 1. The proposed disposition actions have been categorized, such as repair, rework, use-as-is, or reject/scrap.
 - The personnel/organization have been identified to implement the disposition and a schedule for completion of actions is included.

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- 3. The root cause and, if appropriate, action(s) to preclude recurrence, have been described.
- Appropriate technical justification is documented for use-as-is and repair dispositions.
- 5. Scientific investigation or documents, procedures, plans, work orders, etc., that are to be used to resolve the nonconforming condition have been referenced in the disposition.
- 6. The technical details for completion of the required actions are accurately and adequately described in the proposed disposition.
- 7. The proposed action complies with scientific investigation plans or documents, rules, procedures, reports, standards and regulatory requirements.
- 8. If a change to reflect an as-built condition is appropriate, then the action(s) to change the existing scientific investigation plans or documents, rules, drawings, procedures, reports, standards, etc. has been addressed and cross-referenced.
- 9. Internal interfaces between divisions and external interfaces with subcontractors and other organizations or departments shall be identified.
- 5.5.5 The Responsible Organization shall obtain any necessary concurrences from technical specialist and any other organizations impacted by the corrective action. Reviews for approval and concurrence shall be commensurate with those which approved the original specifications.
- 5.5.6 At a minimum the disposition must be approved by the Responsible Organization Manager. If

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the individual responsible for the original specifications is different than the Responsible Manager and the technical specialist responsible for the disposition, this individual must verify the disposition.

- 5.5.7 The Responsible Organization Manager, or delegated technical specialist, shall return the NCR with the proposed disposition and necessary concurrences to the EM NCR Coordinator.
- 5.5.8 The NCR shall then be forwarded to the QAPM or delegated quality specialist for review and comment or approval to ensure that appropriate QA requirements have been included. The QAPM or quality specialist shall ensure that the information identified in Paragraph 5.5.2 has been included or considered in the disposition.
- 5.5.9 Upon approval, the QAPM or quality specialist shall forward the NCR to the EM NCR Coordinator.

5.6 Implementation of Disposition Actions

- 5.6.1 The EM NCR Coordinator transmits the NCR to the Responsible Organization for implementation of the approved disposition.
- 5.6.2 The Responsible Manager, or delegated technical specialist, shall coordinate the necessary activities to complete the disposition instructions, including notification to the QAPM so that any necessary inspection and verification activities are performed for NCR closure.
- 5.6.3 When additional time is needed to complete actions, the Responsible Manager, or delegated technical specialist, shall provide a written request to the QAPM to adjust the completion date with an explanation of the delay. This extension request shall be

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submitted on or before the scheduled due date.

5.6.4 Upon completion of the disposition actions, the Responsible Manager, or delegated technical specialist, shall sign and date the NCR and then notify the QAPM of action completion.

5.7 <u>Verification and Closeout of NCRs</u>

- 5.7.1 The Responsible Manager shall inform the QAPM when the actions stated in the disposition are complete and ready for inspection and/or verification.
- 5.7.2 The QAPM shall request the cognizant inspection organization to perform inspections of items when an inspection is needed to verify the satisfactory performance of the item according to the disposition.
- 5.7.3 The QAPM, or delegated quality specialist, shall perform verification of corrective actions through assessment, review of test/inspection results, completed procedure, work plan, or drawing revisions, etc., to assure corrective actions have been completed in accordance with the disposition. The "Verification of Corrective Action" block on the NCR form is then completed and signed by the cognizant inspector or quality specialist.
- If the QAPM, or delegated quality specialist, determines that the completed action does not comply with the stated disposition or that the results of the actions were unsatisfactory, the Responsible Manager for the disposition shall be notified. The unsatisfactory results of the QAPM verification activities shall be documented and attached to the NCR form.
 - 5.7.4.1 The QAPM's statement shall include the conditions found unacceptable

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and the requirement/actions needed to implement the disposition.

- 5.7.5 The NCR shall remain open until the required work has been completed in accordance with the original approved disposition and verified by the QAPM. If the disposition cannot be accomplished as stated the division responsible for the corrective action shall submit a revision to the NCR for disposition in accordance with 5.8.5.
- 5.7.6 When the disposition and corrective actions have been completed satisfactorily and verified through review, the QAPM shall sign the "Final CQO Review" block and forward the copy to the EM NCR Coordinator.
- 5.7.7 The EM NCR Coordinator shall transmit a copy of the completed NCR to the SQA NCR Coordinator for final SQA review and closeout.

NOTE

The SQA review shall address the completeness of the NCR documentation and may verify the implementation of commitment.

- 5.7.8 The SQA NCR Coordinator shall forward the NCR to the cognizant Quality Engineer (CQE) within SQA for an independent QA review. When the CQE determines that the NCR is complete and adequate the CQE shall attach a letter of concurrence to the NCR. Submit the package to indicate completion of the SQA review.
- 5.7.9 If the CQE determines that the NCR is not complete or does not adequately address the nonconformance, the NCR will be sent back to the QAPM, or delegated quality specialist, for further action.

NOTE

When NCRs have associated revisions, all previous revisions must be closed prior to closing the latest revision. This is to assure that all actions required

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for closure of the nonconforming conditions are completed.

- 5.7.10 When the CQE determines that the NCR is adequate and attaches the final review concurrence letter, the NCR will be forwarded to the SQA NCR Coordinator and will be considered closed.
- 5.7.11 Following closure of the NCR, the SQA NCR Coordinator will update the NCR database and transmit the NCR back to the EM NCR Coordinator for transmittal to the EM records center in accordance with 3-21000-ADM-17.01.
- 5.7.12 The EM NCR Coordinator shall notify the QAPM that the NCR has been closed. The QAPM shall then coordinate the removal of NCR status tags.

5.8 Corrections/Revisions to NCRs

- 5.8.1 When corrections to NCRs are necessary, they shall be made by striking (i.e., drawing a line through) the entry to be changed and initialing and dating the change. Additions shall be identified by brackets, circling, clouding etc. and shall also be initialed and dated.
- 5.8.2 Corrections or additions that alter the intent of the NCR, technical aspects or scope of the disposition that occur during the approval process but prior to final approval of the disposition, shall be routed through all organizations that originally provided approval/concurrence. Their approval/concurrence is then indicated by initialling and dating adjacent to the change or to their original signature.
- 5.8.3 Minor editorial changes or corrections that do not alter the intent of the NCR, technical aspects or scope of the disposition do not require additional concurrences other than the quality specialist.

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- 5.8.4 Corrections or additions that alter the intent of the NCR, that are necessary after the disposition has been approved and issued, shall be processed as an NCR revision in accordance with 5.8.5.
- bearing the same NCR number, except with a higher revision number shall be initiated and the previous revision closed out. Superseded or revised NCRs shall be cross-referenced so that a researcher can easily locate the most recent revision. The nonconformance description shall clearly state the reason for the revision. The revised NCR must be processed through the same documentation and validation steps as the original NCR.

5.9 Loss of an Original NCR

- When an original NCR is lost or destroyed, a copy of the NCR shall be designated as the new original by stamping "Duplicate Original" in red ink at the top of the NCR copy and initialing and dating by the QAPM. If the original NCR is found, it shall be destroyed, since it has been replaced.
- When a copy is not available, a voided NCR shall be issued using the NCR number of the lost original. A new NCR shall be generated using information from the NCR database and input from personnel involved with the lost NCR to reconstruct the facts. The voided NCR and the new NCR shall cross-reference each other.

6.0 RECORDS

6.1 Controlled Documents

None.

6.2 Records Center Documents: Records associated with this procedure shall be submitted to the EM records center in accordance with procedure number 3-21000-ADM, 17.01, Records Management, as identified below:

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Nonconformance Report (NCR) Package:

- a. Closed NCRs with supporting documents
- b. Voided NCRs with supporting documents, if appropriate
- d. Completed NCR Logs

7.0 REFERENCES

- 7.1 1-10000-ADM-16.01, Occurrence Reporting Process
- 7.2 1-50000-ADM-15.01, Control of Nonconforming Items
- 7.3 EM Department Administrative Procedure 3-21000-ADM, 17.01, Records Management.
- 7.4 EM Department Quality Assurance Program Description, Manual No. 21000-QAPD.

8.0 ATTACHMENTS

Attachment 1: EM NCR Flow Chart

Attachment 2: Nonconformance Report (NCR) Form

Attachment 3: NCR Instruction Sheet Attachment 4: Nonconformance Log

Attachment 5: NCR Status Tag (facsimile)

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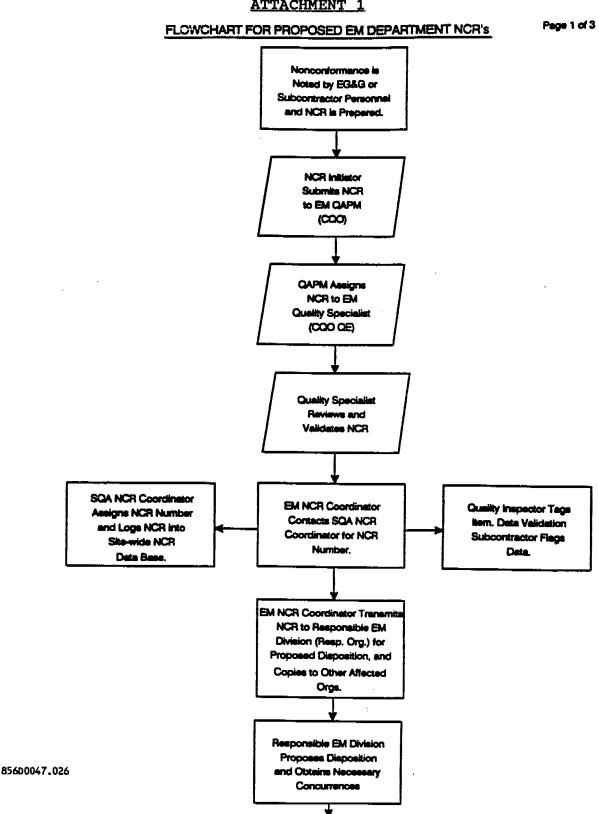
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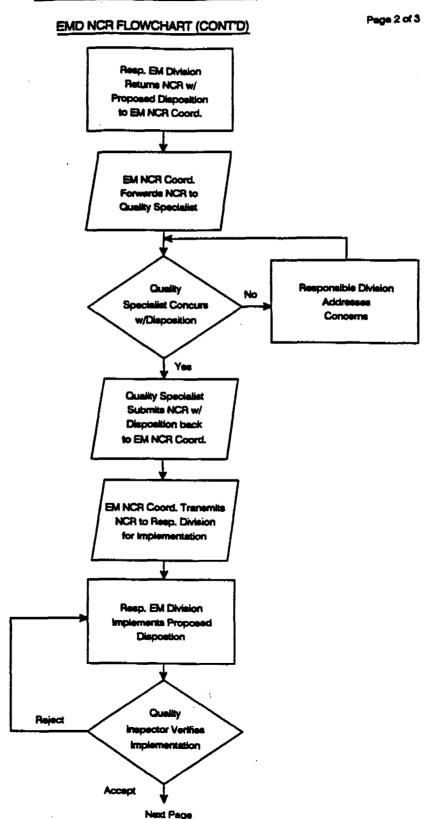
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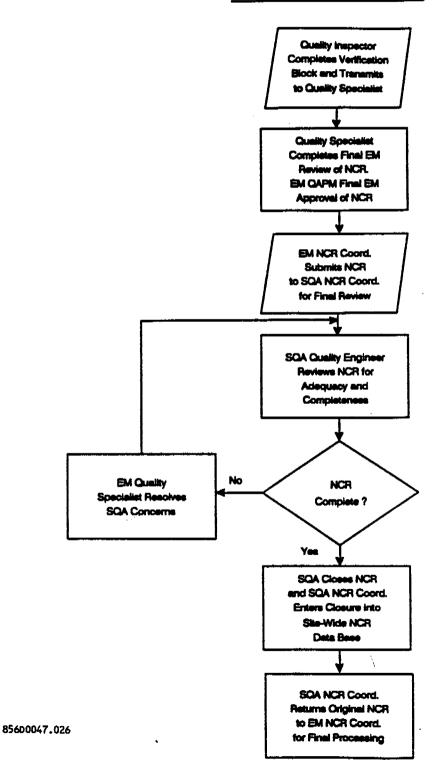
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ATTACHMENT 2

NONCONFORMANCE REPORT FORM
(Replaced w/attached NCR Form from 1-5000-ADM-15.01)

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| 8 | | • | • | Cause Code: (27) |
| | | Signature | | |
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| 3 | Final CGA Review (HCR Closed) | Signaure (3) | | |
| 1 | Final SCA Review (HCR Cleaned) | | Printed Memo/Dapi. | Employee # Date |
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ATTACHMENT 2

NONCONFORMANCE REPORT FORM

| PAC MONCONFORMANCE REPO | SE 2 OF 2 RT CONTINUATION PAGE Page: of |
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| EGEG ROCKY FLATS | NCR No.: |
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ATTACHMENT 3

NCR INSTRUCTION SHEET (Replaced with NCR Instruction Sheet from 1-5000-ADM-15.01)

NOTES

- 1. Blocks that are not applicable to the specific item documented on the NCR, shall be marked "N/A".
- 2. When additional space is needed to document information regarding the nonconformance, a "Continuation Page" as shown in Appendix 3, may be attached as necessary to supplement the main NCR form.

HEADING

Block

- NCR No. FQE NCR Coordinator assigns tracking number after CQO Engineer/Quality Specialist has reviewed reported nonconformance and determined it to be valid. For Waste NCRs, the NCR number is obtained as the NCR is logged into the WEMS system.
- 2. WCF/Auth/Ref.# Initiator enters the WCF, Authorization or Job Reference number shown on the job or project documentation under which the nonconforming item occurred. For Environmental NCRs, this would correspond the Project Manager.
- 3. Engineering Order # Initiator enters the Engineering Order Number associated with the nonconforming item, as applicable.
- 4. P.O. # Initiator enters the applicable Purchase Order Number associated with the nonconforming item, as applicable.
- 5. Page This pagination field will be completed by the CQO during the final QA review and closure process. It will reflect the total pages included with the closed NCR form.

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6. Bldg. # - Initiator enters the building number/location in which the nonconforming item is installed or the applicable building/location where the item will be installed. For spare parts or stock items with no assigned building number, enter N/A. For Waste NCRs, this is the building or area of origination for the item. For Environmental NCRs, the designated area of the plant site (E.G., Operable Unit, sedimentation ponds, monitoring station number) should be entered.

Nonconformance Block

Block

- Contractor/Supplier Initiator enters the name of supplier, contractor or responsible work organization who supplied, fabricated or installed the nonconforming item.
- 8. Category Initiator indicates the appropriate Vital Safety Functions Category (i.e., Category 1, 2, 3 or 4) specified in the project or job documentation. For situations where no project or job documentation exists, contact the Operations/Functional Manger, Engineering or Quality to obtain the appropriate assigned category.
- 9. Procurement Level Initiator indicates the assigned procurement level (PL1, PL2 or PL3) for procurement related NCRs.
- 10. I.D.# Initiator enters the associated Rocky Flats plant equipment or waste container identification number for the nonconforming item. For Environmental NCRs this would include such identification numbers as borehole numbers, location number, etc.
- 11. Dwg(s). Initiator enters the drawing numbers and respective revisions which shows the nonconforming items required configuration. Drawings that show its location may also be recorded.

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- Spec./STD(s) Initiator enters the specification, 12. requirement, standard or code and respective revisions. which applies the nonconforming item is in violation of.
- 13. NCR Type - Completed by the COO by entering an "X" in the appropriate box after the work which best describes the NCR Type.
- 14. Item - Initiator enters the description of the item for which the nonconformance has been identified. Examples: Glovebox overheat detector, backflow preventer (Febco Model 805Y), Plant Air Isolation Valve (3/4" diameter), etc.
- 15. Location - Initiator enters a description of the physical location within the building or area where the nonconforming item is installed or being stored. Examples: "Room \$105, column B-4", "130 Warehouse", "Southwest end of glovebox GB-12", etc.. The location of the item when the nonconformance was identified.
- 16. Nonconformance Description - Completed by Initiator by identifying in detail a description of the nonconformance. Include specific paragraphs of standards or specifications, drawing details, sketches, dates, and other data which specifically describes the existing condition and the requirements violated. Essentially, state what the existing condition is and what the requirement documents state the condition should be. Also, complete the "Reported By" section.
- 17. Tag # - Completed by entering the unique tag number from the NCR Status Tag that is attached to the item.
- 17a. Flag Completed by entering how nonconforming data are flagged. For example: R = reject data, A = acceptable with qualifications.
- 18. QA Validation - Completed by the reviewing CQO Engineer/Quality Specialist to allow NCR issue.

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- 19. NC Code The CQO Engineer/Quality Specialist enters nonconformance code that best describes the item deficiency. See section 4.4.8 of this procedure.
- 20. Responsible Organization Completed by the NCR Coordinator as assigned by the cognizant quality organization (For environmental NCRs, this is assigned by the QAPM).
- 21. Operability Evaluation Required? The CEO indicates whether an Operability Evaluation is required for the identified nonconforming item by checking "YES" or "NO" blocks as applicable, followed by their signature and the date.
- 22. Root Cause Completed by the CE/CTS responsible for documenting the reason the nonconforming condition occurred. Also, include details of measures that are to be taken for recurrence control. This block may also be completed by the CQO.
- 23. Disposition Resolution to the nonconforming item, completed by the dispositioning engineer or Responsible Organization. See section 5.8 of this procedure.
- 24. Documents Requiring Change Completed by the Cognizant Engineer/Technical Specialist performing the disposition to indicate the affected drawings, procedures or documents that require revisions to reflect the accepted deviations or prevent recurrence.
- 25. Disposition Approval/Concurrences These are the signatures of the individuals who reviewed and concurred with the disposition.
- 26. QA Comments This block is completed by the CQO Engineer/Quality Specialist who has reviewed and accepted the NCR disposition. Additional inspection or verification instructions to aid in the corrective action verification process may be added in this block.

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CLOSEOUT BLOCK

- 27. Cause Code This block is completed by the CQO based on the root cause detailed in block 21. See section 4.4.8 of this procedure.
- 28. Verification of Corrective Action Record details of the results and verification activities that support the completion of the NCR disposition, including reference to associated work packages, inspection reports, drawings or procedure numbers, etc. This block is completed by the CQO performing the verification activities.
- 29. Final CQA Review Completed by the CQO Engineer/Quality Specialist.
- 30. Finals QA Review Completed by the SQA Quality Engineer performing the final review of the Nonconformance Report to allow closure.

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ATTACHMENT 4

ROCKY FLATS PLANT ENVIRONMENTAL MANAGEMENT PROGRAM NONCONFORMANCE REPORT LOG

| DATE | NUMBER EM NCR | PREPARED BY | RESPONSIBLE ORGANIZATION | DESCRIPTION | STATUS | DATE CLOSED |
|------|------------------|----------------|-----------------------------|-------------|--------|----------------|
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ATTACHMENT 5

NCR STATUS TAG

THIS MATERIAL NOT TO BE PROCESSED EXCEPT AS AUTHORIZED BY:

AMPLE (SIGNATURE) (DATE)

(MATERIAL IDENTIFICATION)